

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

2 LEMOYNE PARKWAY))	
CONDOMINIUM ASSOCIATION,))	
Plaintiff,))	Case No. 1:23-cv-2130
v.))	NOTICE OF REMOVAL OF
TRAVELERS CASUALTY INSURANCE))	ACTION UNDER 28 U.S.C. § 1441
COMPANY OF AMERICA,))	(Diversity Jurisdiction)
Defendant.))	CIRCUIT COURT of
		COOK COUNTY
		No. 2023 L 001261

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA (“Travelers”), by and through its attorneys, pursuant to 28 U.S.C. §§ 1332, 1441(a) and 1446, hereby removes to this Court the state court action described below:

1. On or about February 7, 2023, Plaintiff, 2 LEMOYNE PARKWAY CONDOMINIUM ASSOCIATION (the “Association”), filed an action in the Circuit Court of Cook County, Illinois, under Case No. 2023 L 001261, against Defendant Travelers. The Association’s Complaint is attached hereto as Exhibit A and incorporated herein by reference.
2. On March 7, 2023, Travelers was served with Summons and the Complaint at its corporate headquarters in Hartford, Connecticut.
3. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b)(1) and (2)(B) as it is filed within thirty (30) days after Travelers’ receipt of the Association’s Complaint on or after March 7, 2023.
4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332 and is one which may be removed to this Court by Travelers pursuant to the

provisions of 28 U.S.C. § 1441 in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

5. At the time the Complaint was filed, and at all times subsequent thereto, Plaintiff the Association was and is an Illinois corporation with its principal place of business in the State of Illinois.

6. At the time the Complaint was filed, and at all times subsequent thereto, Defendant Travelers was and is a Connecticut corporation with its principal place of business in the State of Connecticut.

7. The Complaint alleges damages in excess of \$287,000.

WHEREFORE, Defendant, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, prays that the above-entitled cause, currently pending in the Circuit Court of Cook County, Illinois, under Case No. 2023 L 001261, be removed therefrom to the United States District Court for the Northern District of Illinois and that this cause proceed in this Court as an action properly removed thereto.

Respectfully submitted,

/s/ Thomas B. Orlando
Thomas B. Orlando
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Attorneys for Defendant,
TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

CERTIFICATE OF SERVICE

I, the undersigned, on oath, subject to penalty of perjury, state that I served the Notice of Removal and Appearance, by emailing to all counsel of record on April 4, 2023, at the email addresses set forth below.

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/s/ Thomas B. Orlando _____

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